Kolak, Shari

From: Kolak, Shari
Sent: Monday, February 10, 2014 2:50 PM
To: Kolak, Shari
Subject: fyr MDEQ issues

Wally,

Your October 29, 2013 letter identifies the following issues and recommendations to be included in the second FYR for West KL . However, some of the issues are already addressed thru the KLA Group's recent investigations. Can you please confirm

1. **The full extent of the groundwater contamination northwest of the landfill is unknown.**
MDEQ's recommendation was to further investigate the leading edge (west of 1st street) to determine full extent of contamination. Wasn't this done by conducting the additonal hydrogeolgic investiagations in

2. **The plume appears to be expanding to the northwest of the site.**

The following are issues and recommendations that should be identified in the upcoming 5YR Report:

Issues:

- The full extent of the groundwater contamination northwest of the landfill is unknown.
- The plume appears to be expanding to the northwest of the site.
- Additional sentinel wells are needed northwest of the landfill to provide early warning of potentially vulnerable private water supply wells.
- MNA, as the sole groundwater remedy, is not meeting expectations at this site. There is an apparent expansion of groundwater contaminants not amenable to biodegradation (1,4-Dioxane and Tetrahydrofuran [THF]).

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- **An evaluation of effectiveness of MNA should be conducted. The PRPs should provide an annual evaluation of contaminant trends at the landfill boundary. If necessary, develop a Contingent Remedial Action Plan to have in place in the event of remedy failure.**

The KLA Group evaluated MNA in the December 10, 2010 "Groundwater Performance Monitoring Report, Initial 5-Year Evaluation of MNA Remedial Action Activities"

We agree with MDEQ that a Contingent Remedies should be evaluated

- **The KL Landfill Group should prepare a plan to test for methane in soil gas at nearby residences on a recurring basis, perhaps annually.**

According to the January 2014, Semi-annual progress report (July – December 2013), Table C-9 (perimeter gas monitoring probe sampling data) shows that post-2008 (when the passive gas collection system was converted to active gas collection), methane levels have been controlled or eliminated (% CH4 was 0.0) in all perimeter gas probes from 2008 to 2013 except in one occurrence on 7/15/11 where methane reported at 14.9% in GMP-3M; methane at 27/6 % in GMP-5; methane at 41/9 % in GMP-8; and methane at 20.8% in GMP-10, methane at 13.9% at GMP-15; and methane at 0.1 % at GMP-16D. **Given this, isn't the above bullet addressed or does MDEQ still feel that soil gas at nearby residences should be tested?**

- **The KL Landfill Group should investigate whether pharmaceuticals have been released to the groundwater from the landfill.**

Does MDEQ have cleanup standards for pharmaceuticals?

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